

Follow-up Response to USEPA Clean Air Act (CAA) Section 114 Request

Proposed PM₁₀ Ambient Air Monitoring Location

Midwest Terminals of Toledo International, Inc. (MWTTI), Toledo, Ohio

As follow-up to the United States Environmental Protection Agency's (USEPA's) Clean Air Act (CAA) Section 114 request to Midwest Terminals of Toledo International, Inc. (MWTTI), Labyrinth Management Group, Inc (LMG) has completed an evaluation for the proposed siting of a single continuous ambient air monitor for particulate matter 10 microns and less in size (PM₁₀) at MWTTI's Facility 1 in Toledo, Ohio. Based on the results of LMG's evaluation, the proposed location for the ambient air monitor is provided on the attached Figure 1.

As required by USEPA, LMG's siting evaluation and the final proposed location for the PM₁₀ ambient air monitor was based on requirements and criteria contained in 40 CFR Part 58 Subpart G Appendix D and Appendix G. These requirements and criteria included the following:

- Use of "Microscale" siting criteria that are used to evaluate specific source impacts at fence lines and concentrations of air pollutants in areas with dimensions up to about 100 meters;
- Monitor probe or at least 80% of monitoring path must be located 2 to 15 meters above ground level
- PM monitor not to be located in unpaved areas unless vegetative ground is present year round
- Roof-top monitors to be at least 2 meters from walls, parapets, or structures
- PM monitor to be 10 meters or more from drip line of trees; and
- PM monitor at least 20 meters (preferred 40) from nearest road

The proposed ambient air monitor location is the roof of a MWTTI-owned building on the western property line of Facility 1 that is central to bulk material handling operations. The building roof is approximately 27 feet above ground surface (abs) at the peak and has readily available electrical service. The nearest adjacent structure/building is located approximately 180 feet away with a maximum height of 24 feet abs.